



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460**

7506c:m Patterson:12/1/03:V:EFB:ESPP:CONSULTATION packages/captan/captan effects memo with ltr
**OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES**

Memorandum

From: Michael Patterson, Ph.D. /s/ 12-1-03
Environmental Field Branch
Field and External Affairs Division

To: Arthur-Jean Williams, Chief
Environmental Field Branch
Field and External Affairs Division

Subject: Effects Determination for Captan for Certain Pacific Anadromous Salmonids

I reviewed data and other information for captan, a registered fungicide named by the Washington Toxics Coalition (WTC) and included in the court order for 'effects determinations' and potential consultation with the National Marine Fisheries Service. Captan is registered nationally for use on a wide variety of orchard crops, berries, seeds, turf, and ornamentals. The Environmental Fate and Effects Division (EFED) has completed an environmental risk assessment for a "Reregistration Eligibility Decision (RED) Captan" issued in November, 1999.

That assessment concludes that levels of concern are exceeded for acute risk to endangered freshwater fish exposed to runoff and drift from agricultural and turf treatment sites.

I have adapted the more general findings of the EFED assessment to develop an analysis of the potential for effects on endangered and threatened Pacific salmon and steelhead Evolutionary Significant Units (ESUs) from current uses in California and the Pacific Northwest. My analysis addresses changes in uses and rates that have been put on most labels since the RED was developed. OPP's levels of concern are exceeded for direct acute risks for several ESUs. No criteria are exceeded for indirect effects on aquatic invertebrate that may serve as prey for endangered or threatened fish, or for aquatic vascular plants that may serve as cover. There are a number of mitigating factors that reduce many, but not all concerns.

Based upon the available information, I determined that some use of captan on crops and certain non-crop sites may affect 2 ESUs under labeled application directions, may affect but is not likely to adversely affect 11 ESUs, and will have no effect on 13 ESUs. No chronic effects are expected for any use.

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